6.0 MITIGATION MONITORING PROGRAM

As the Lead Agency under the CEQA, the CSLC is required to adopt a program for reporting or monitoring regarding the implementation of mitigation measures for this Project, if it is approved, to ensure that the adopted mitigation measures are implemented as defined in this EIR. This Lead Agency responsibility originates in Public Resources Code section 21081.6(a) (Findings), and the State CEQA Guidelines sections 15091(d) (Findings) and 15097 (Mitigation Monitoring or Reporting).

6.1 MONITORING AUTHORITY

The purpose of a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) is to ensure that measures adopted to mitigate or avoid significant impacts are implemented. An MMCRP can be a working guide to facilitate not only the implementation of mitigation measures by the project proponent, but also the monitoring, compliance and reporting activities of the CSLC and any monitors it may designate.

The CSLC may delegate duties and responsibilities for monitoring to other environmental monitors or consultants as deemed necessary, and some monitoring responsibilities may be assumed by responsible agencies, such as affected jurisdictions and cities, and the California Department of Fish and Game (CDFG). The number of construction monitors assigned to the project will depend on the number of concurrent construction activities and their locations. The CSLC or its designee(s), however, will ensure that each person delegated any duties or responsibilities is qualified to monitor compliance.

Any mitigation measure study or plan that requires the approval of the CSLC must allow at least 60 days for adequate review time. When a mitigation measure requires that a mitigation program be developed during the design phase of the project, the Applicant must submit the final program to CSLC for review and approval for at least 60 days before construction begins. Other agencies and jurisdictions may require additional review time. It is the responsibility of the environmental monitor assigned to each spread to ensure that appropriate agency reviews and approvals are obtained.

The CSLC or its designee will also ensure that any deviation from the procedures identified under the monitoring program is approved by the CSLC. Any deviation and its correction

shall be reported immediately to the CSLC or its designee by the environmental monitor assigned to the construction spread.

6.2 ENFORCEMENT RESPONSIBILITY

The CSLC is responsible for enforcing the procedures adopted for monitoring through the environmental monitor assigned to each construction spread. Any assigned environmental monitor shall note problems with monitoring, notify appropriate agencies or individuals about any problems, and report the problems to the CSLC or its designee.

6.3 MITIGATION COMPLIANCE RESPONSIBILITY

The Applicant is responsible for successfully implementing all the mitigation measures in the MMCRP, and is responsible for assuring that these requirements are met by all of its construction contractors and field personnel. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Other mitigation measures include detailed success criteria. Additional mitigation success thresholds will be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

6.4 GENERAL MONITORING PROCEDURES

Environmental Monitors. Many of the monitoring procedures will be conducted during the construction phase of the project. The CSLC and the environmental monitor(s) are responsible for integrating the mitigation monitoring procedures into the construction process in coordination with the Applicant. To oversee the monitoring procedures and to ensure success, the environmental monitor assigned to each construction spread must be on site during that portion of construction that has the potential to create a significant environmental impact or other impact for which mitigation is required. The environmental monitor is responsible for ensuring that all procedures specified in the monitoring program are followed.

Construction Personnel. A key feature contributing to the success of mitigation monitoring will be obtaining the full cooperation of construction personnel and supervisors. Many of the mitigation measures require action on the part of the

construction supervisors or crews for successful implementation. To ensure success, the following actions, detailed in specific mitigation measures, will be taken:

- Procedures to be followed by construction companies hired to do the work will be written into contracts between the Applicant and any construction contractors. Procedures to be followed by construction crews will be written into a separate document that all construction personnel will be asked to sign, denoting agreement.

- One or more pre-construction meetings will be held to inform and train all construction personnel about the requirements of the monitoring program.

- A written summary of mitigation monitoring procedures will be provided to construction supervisors for all mitigation measures requiring their attention.

General Reporting Procedures. Site visits and specified monitoring procedures performed by other individuals will be reported to the environmental monitor assigned to the relevant construction spread. A monitoring record form will be submitted to the environmental monitor by the individual conducting the visit or procedure so that details of the visit can be recorded and progress tracked by the environmental monitor. A checklist will be developed and maintained by the environmental monitor to track all procedures required for each mitigation measure and to ensure that the timing specified for the procedures is adhered to. The environmental monitor will note any problems that may occur and take appropriate action to rectify the problems.

Public Access to Records. The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available for public inspection by the CSLC or its designee on request.

6.5 MITIGATION MONITORING TABLE

The following sections present the mitigation monitoring tables for each environmental discipline. Each table lists the following information, by column:

- Impact (impact number, title, and impact class);

- Mitigation Measure;

- Location (where the impact occurs and the mitigation measure should be applied);
- Monitoring/reporting action (the action to be taken by the monitor or Lead Agency);
- Effectiveness criteria (how the agency can know if the measure is effective);
- Responsible agency; and
- Timing (before, during, or after construction; during operation, etc.).

1 **Table 6-1**
2 **Mitigation Monitoring Program**

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
Land Use, Public Services, Transportation and Circulation, Noise, Visual Resources, Energy and Mineral Resources, Agricultural Resources, and Environmental Justice – These sections contain no mitigation measures for the proposed Project impacts.						
Geological Resources						
GEO-2: Damage to Facilities Due to Beach Scour (Class II)	**GEO-2a:** Consistent with recommendations by the County Energy Division (Santa Barbara County Energy Division 1999) and the California State Lands Commission (CSLC) Engineering Department, the marine loading line shall be monitored after winter storms for exposure, debris impact, and for unsupported spans. Should the pipe free span approach 30 feet (9 m) in the future, remedial actions, e.g., sandbags beneath the pipe, permanent pipe supports, evacuating the line, etc., shall be implemented to maintain the integrity of the line. In addition, assessment of the strains on the pipeline due to settling should be conducted when the pipeline is exposed and any additional supports should be added at that time.	On the beach near the EMT.	The Applicant employee (monitor) inspects the pipeline at the time determined by the County geologist to be "after winter storms". The monitor shall inspect the pipeline and prepare a photographic report on the pipe condition. The Applicant shall implement the identified remedial actions if the condition is as identified in **MM GEO-2a**. The County shall review the report and inspect if free span changes are noticed. Inspection by the County after any remediation activities are completed.	Unchanged settling of the pipe would indicate effectiveness of the measure.	CSLC and SBC	Every year the pipeline shall be inspected. Inspection by the County after any erosion events occur.
GEO-3: Facilities Damage due to Corrosion (Class II)	**GEO-3a:** Consistent with recommendations by the County Energy Division (Santa Barbara County Energy Division 2002) and the CSLC Engineering Department, the marine loading line shall be monitored after winter storms. In the event that the line is exposed by winter beach scour, the Applicant shall inspect the line with GUL and confirm thickness of problem areas with ultrasonic testing	On the beach near the EMT.	The Applicant employee (monitor) inspects the pipeline at the time determined by the County geologist to be "after winter storms". The monitor shall inspect the pipeline and prepare a photographic report on the pipe condition. The Applicant shall implement the identified repair actions if the condition is as identified in **MM**	Maintaining coating on the pipe would indicate effectiveness of the measure.	CSLC and SBC	Every year the pipeline shall be inspected. Inspection by the County after any repair activities are completed.

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	technology. The Applicant shall re-coat and re-wrap all segments of the line damaged or missing pipeline coating. In addition, the remaining unexposed portion of pipe in the intertidal area shall similarly be excavated (preferably with hand tools), inspected, tested, re-wrapped, and re-coated. In addition, other structural components of the EMT, including the tanks, connecting pipelines, and valves shall be monitored for corrosion-related damage. This maintenance should be conducted on the pipeline if pipeline exposure does not occur within the next 5 years. The loading pipeline testing and inspection program shall comply with MOTEMS.		**GEO-3a**. The County shall review the report and inspect if free span changes are noticed. Inspection by the County after any after any erosion events occur.			
GEO-4: Erosion of Drainages (Class II)	**GEO-4a:** Best Management Practices (BMPs) such as temporary berms and sedimentation traps, including silt fencing, straw bales, and sand bags, shall be installed prior to work involving ground disturbance. The BMPs shall include maintenance and inspection of the berms and sedimentation traps during rainy and non-rain periods, as well as re-vegetation of impacted areas. Re-vegetation shall address plant type as well as monitoring to ensure appropriate covering of exposed areas.	The EMT and vicinity, beach, Devereux Slough.	The monitoring agency or designated monitor shall inspect the site of the ground disturbing activities, if such occur.	If erosion is avoided after the ground disturbing activities, the measure is effective.	CSLC and SBC	During and following ground disturbing activities.
GEO-5: Faulting and Seismicity (Class II)	**GEO-5a:** The Applicant shall cease terminal operations and inspect all EMT pipelines and storage tanks following any seismic event in the region (Santa Barbara County and	At the EMT facilities.	The Applicant shall report applicable seismic events and inspection results. The monitoring agency or designated monitor shall	Demonstration of EMT equipment integrity following an applicable seismic event.	CSLC and SBC	Following each applicable seismic event.

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	offshore waters of the Santa Barbara Channel and Channel Islands) that exceeds a Richter magnitude of 4.0. The Applicant shall report the findings of such inspection to the CSLC and the SSRRC and shall not reinstitute operations of the EMT until authorized to do so by the CSLC.		review and approve the retrofitted facility.			
Hazards and Hazardous Materials						
HM-1: Acute Risks of Crude Spills (Class II)	**HM-1a:** The Applicant shall institute measures to reduce the crude oil hydrogen sulfide content before the crude oil leaves the EOF. These measures could include increased crude oil scrubbing or other measures to reduce the hydrogen sulfide levels in the crude oil.	At the EOF.	Crude H_2S sampling and content.	Crude H_2S levels maintained below target level.	City of Goleta	Prior to lease renewal.
	HM-1b: The Applicant shall, within 6 months time, develop and submit to the CSLC and the County of Santa Barbara, for review and approval, a tank maintenance program for the EMT crude oil tanks that addresses inspections, inspection frequency (both external and internal), maintenance of tank shell and appurtenances, non-destructive testing, cathodic protection, dike and drain maintenance, and seismic analysis and retrofits to ensure tanks conform to current building codes. API 653 full tank inspections should be conducted by a registered API 653 tank inspector at least every 5 years.	At the EMT.	Submission of the program, implementation of the program. API 653 Inspection report every 5 years.	No failures of the tanks are observed, all problems are detected before failures have a chance to occur.	CSLC and Santa Barbara County.	Within 6 months after the lease renewal.
HM-3: Increased Spill Sizes	**HM-3a:** The Applicant shall ensure that the loading line can be operated in a vacuum and that operation in a	At the EMT and the	Annual CSLC audits of facility.	Vacuum testing, changes in operating	CSLC	Prior to lease renewal.

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
Due to Loading Pipeline Vacuum/ Evacuation Operation (Class II)	vacuum is established as part of the terminal operations manual and as part of the oil spill response. In lieu of vacuum operation, applicant could implement a method for evacuating the loading line in the event of a leak. Evacuation of the line should be possible at all times during loading (even when barge is empty).	loading line.		procedures.		
HM-4: Increased Spill Sizes Due to Loading Pipeline Leak Detection (Class II)	**HM-4a:** The Applicant shall ensure that both the shipping end and the receiving end of the loading pipeline are equipped with flow meters and that the flow meters utilize a means of conducting automatic and continuous flow balancing to an accuracy of at least 2 percent. Any deviations shall activate an alarm system at both the shipping and receiving locations. Barge loading should only occur during daylight hours when there is clear visibility to ensure smaller leaks are detectable.	At the EMT onshore.	Annual CSLC audit, loading records, EMT operations manual.	Testing of leak detection capabilities.	CSLC, SBC	Prior to lease renewal.
HM-5: Increased Spill Sizes Due to Failure to Deploy Loading Booms (Class II)	**HM-5a:** The Applicant shall pre-boom all oil transfers using booms that are effective for the ocean conditions at the EMT location. For loading operations, the boom shall enclose the water surface surrounding the vessel to provide containment for the entire vessel at the waterline. The boom shall be deployed so that it provides a stand-off of not less than 4 feet (1.2 m) from the outboard side of the vessel.	Between the EMT and the mooring.	Annual CSLC audit, loading records, EMT operations manual.	Booming of vessel.	CSLC	Prior to lease renewal.
HM-6: Spills Due to Loading	**HM-6a:** The Applicant shall investigate and utilize a non-destructive testing procedure, which will enable inspection	Between the EMT and the	The Applicant shall report on the results of the inspection to the County every three years.	Acceptable corrosion and stress levels.	CSLC, SBC	Prior to lease renewal.

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
Pipeline Failure from Inadequate Loading Pipeline Inspections (Class II)	of the loading pipeline from the pump-house to the hose connection for both corrosion, internal and external, and for allowable pipe stresses due to settling. Visual inspection of the entire pipeline route for unsupported spans or other pipeline route anomalies should also be conducted at least every 3 years.	mooring.	The County shall review and approve the inspection results.			
HM-7: Spills Due to Pump Leaks and Lack of EMT Pump Drains Spill Containment (Class II)	**HM-7a:** The Applicant shall install drain protection in the form of sealable coverings, valves or other methods to prevent flow of spilled oil through the drains, on the EMT drains located at the far southern end of the EMT, immediately near the pumps and on the far side of the control shack. The drain protection would prevent a spill of crude oil that occurs at the loading pumps and/or at other EMT equipment from entering the drains and affecting the slough. Berms located at this end of the EMT should also be checked to ensure they can contain a worst case discharge from the pumps.	At the EMT pump area.	Annual CSLC audit, EMT operations manual, emergency response plans.	Drill reports.	CSLC, SBC	Prior to lease renewal.
HM-8: Increased Spill Size Due to Spill Response Planning and Drills (Class II)	**HM-8a:** The Applicant shall conduct periodic equipment deployment and on-water drills utilizing the response vessel (the Penguin) as well as other vessels that would respond to a drill. Drills should have a post-drill lessons-learned evaluation which is incorporated into the training and EAP documentation. Procedures for conducting drills should be detailed on the EAP.	Barge and offshore pipeline route.	Annual CSLC audit, EMT operations manual, emergency response plans, drill reports.	Successful drill exercises and reports.	CSLC, SBC	Prior to lease renewal.
HM-9: Spills Due to Barge	**HM-10a.** The Applicant shall replace or convert the barge Jovalan with a	Barge	Vessel inspections.	Presentation of barge credentials to	USCG, SBC	Before 2010.

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
Hull Penetrations (Class II)	double-hulled barge by the 2010 timeframe established by CFR Title 33 as the phase-in date for larger vessels to be double-hulled vessels.			USCG.		
Air Quality						
AQ-1: Increase in Emissions from Operations (Class II)	**AQ-1a.** If the proposed Project requires more than 75 barge trips/loadings in any consecutive 12-month period, the Applicant shall implement an emission reduction program that would consist of the following: (1) Hire a tug and/or assist vessels that have combined NO_x emissions approximately 20 percent lower than the current tug and assist vessels, and (2) Reduce running time of the tug vessel generator engine(s) during the time when the tug vessel is moored at the EMT and is not moving or mooring the barge. The time reduction shall be at least 20 percent.	Mooring of the barge Jovalan	Monitor number of barge trips. If barge trips are above 75 per 12-month period, the applicant shall submit the necessary emission data for the new tug/assist vessels. Review annual emissions for the generators on the vessels.	If total annual emissions of NOx are within the 21.56 ton/yr (15 ton per year increase from baseline), the measure is effective.	APCD	Every 12 months, as the annual emission inventory for the facilities is submitted as required.
	AQ-1b. The operators of the tug and assist vessels shall shut off the main and auxiliary engines during loading when not moving or mooring the barge Jovalan.	Mooring of the barge Jovalan	Monitor the activities of the vessels during loading. Monitor quarterly fuel reports. The vessel fuel consumption should not change drastically per one loading, if no changes have been made to the vessels.	If the fuel consumed by the vessels does not change per loading (if there were no changes to the engines), the measure is effective.	APCD	Monitor vessel activities during every scheduled visit to the barge. Monitor fuel consumption every quarter.
AQ-2: Odor Emissions from Operation (Class II)	**AQ-2a.** The Applicant shall install vapor control devices, e.g., carbon canisters or equivalent devices, on the vents of the crude oil storage tanks. The Applicant shall submit an appropriate replacement schedule for	EMT	A meeting shall be conducted between the Applicant and the APCD to agree on the exact device design, properties, and maintenance schedule. APCD shall inspect upon the	If confirmed odor complaints number does not increase with the increased barge loadings and EMT operation, the	APCD	Inspect after the installation. Monitor proper function every year. Monitor number of odor

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	the vapor control devices to the APCD for its review and approval.		installation. The Applicant shall report when the installation is complete.	measure is effective.		complaints.
	AQ-2b. The Applicant shall install proximity switches on the PSVs on the barge Jovalan to prevent the lifting of the PSVs due to overpressure. The switches shall be telemetered to the control room on the barge and trigger an alarm. The operating procedures shall require immediate shutdown of the pumps in case of overpressure.	Barge Jovalan	A meeting shall be conducted between the Applicant and the APCD to agree on the exact device design, properties, and maintenance schedule. APCD shall inspect upon the installation. The Applicant shall report when the installation is complete.	If confirmed odor complaints number does not increase with the increased barge loadings and EMT operation, the measure is effective.	APCD	Inspect after the installation. Monitor proper function every year. Monitor number of odor complaints.
Hydrology, Water Resources, and Water Quality						
WQ-2: Potential Facilities Leaks and Impacts to Nearby Onshore Waterways (Class I)	**WQ-2a.** A site-specific Storm Water Pollution Prevention Plan shall be prepared and submitted to the California Regional Water Quality Control Board, Central Coast Region, before the lease extension is granted, to prevent adverse impacts to nearby waterways associated with oil spills and contaminated storm water releases not covered under the EAP, which only applies to "significant events" and is not discussed in detail by the OSCP. This plan would similarly include, but not be limited to, site-specific diagrams illustrating primary surface drainage features, e.g., the southeast trending gully leading to the dune swale pond, and proposed spill containment, i.e., dike configurations, within those drainages; delineation of drainage features; and a description of Best Management Practices, including spill containment equipment and procedures that are	Venoco offices	The applicant shall submit the updated plan to the County. The County shall review and approve the plan.	If the water pollution prevention is attained the measure is effective.	CSLC and SBC	Prior to lease renewal.

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	tailored for the project site. The plan shall also describe the source water, existing uses, and water disposal protocol of the onsite pond, in the southwest portion of the EMT.					
Biological Resources						
BIO-1: Oil Spill Impacts to Marine Biological Resources (Class I)	**BIO-1a.** Offshore inspections of the loading pipeline shall be conducted on a regular basis, as determined by the CSLC and/or other regulatory agency, throughout the extended life of the Project. Inspections shall use the best available technology. When structural anomalies are identified that compromise the integrity of the pipeline, as determined by the CSLC and/or other regulatory agency, flow through the pipeline shall cease until repairs can be effected.	The pipeline between the EMT and mooring location.	The Applicant shall inspect the pipeline and provide the report to the County every three years. If any anomalies are detected and repairs being conducted, the County shall inspect the repairs being conducted and approve.	Lack of leaks pipeline leaks.	CSLC and SBC	Every three years, and inspection during repairs if any.
	BIO-1b. The Applicant shall update the OSCP to incorporate changes in activities that result from the proposed Project. For example, the plan shall incorporate detailed response procedures for marine oil spills resulting from vessel groundings or collisions, as well as for pipeline failure and failures occurring during transfer of the oil to and from the barge. Worst-case discharge scenarios shall be updated accordingly. In addition, lessons learned from the cleanup of the 1997 Platform Irene oil spill shall be incorporated into the Response Plan. These lessons include operator training in recognizing the significance of deviations in pipeline operating	Venoco offices	The applicant shall submit the updated plan to the County. The County shall review and approve the plan.	Oil spill cleanup is effective.	CSLC and SBC	Prior to lease renewal.

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	parameters, inspections required to restart equipment that automatically shuts down in response to a process deviation, and rapidly implementing surveillance activities following process deviations to determine if a spill has occurred. The personnel and training sections of the OSCP shall be updated and will identify training requirements for all personnel that would be utilized to respond to oil spills. At a minimum, new personnel shall be trained immediately upon their hiring in the overall operational aspects of oil spill response, including the proper use of all equipment that would be utilized in oil spill response. Annual training for all personnel, which is a Federal requirement, shall also be included in the OSCP to provide personnel with an understanding of their training responsibilities. The annual training shall include training in the operation of new equipment that may be utilized in oil spill response, retraining in the operation of existing equipment, and review of the oil spill response requirements that are identified in the OSCP.					
BIO-4: Marine Vessel Traffic Impacts on Commercial and Recreational	**BIO-4a.** Support vessels shall use designated traffic corridors. If support vessels travel outside such corridors and damage fishing gear, disputes over damage to commercial fishing gear resulting from EMT support vessel traffic shall be submitted to the Joint	Offshore in the vicinity of the EMT and along the barge routes.	The vessel owners and operators shall be informed of the designated routes. The Applicant shall report to the CSLC about informing the vessel operators about the designated routes.	No damage to fishing gear occurs. If damage occurs, the dispute resolution is handled promptly and to the satisfaction of the	CSLC and Joint Oil/Fisheries Committee	The information to the vessel operators and report to the CSLC shall be furnished before the lease

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
Fishing (Class II)	Oil/Fisheries Committee for resolution.			party that sustained damages.		extension is granted.
BIO-5: Vessel Traffic Impacts on Marine Mammals and Turtles (Class II)	**BIO-5a.** The Applicant shall ensure that vessel operators develop and implement a contingency plan that focuses on recognition and avoidance procedures when marine mammals are encountered at sea. Minimum components of the plan include: Existing and new vessel operators shall be trained by a marine mammal expert to recognize and avoid marine mammals prior to project-related activities. Training sessions shall focus on the identification of marine mammal species, the specific behavior of species common to the project area and barge routes, and awareness of seasonal concentrations of marine mammal species. The operators shall be re-trained annually. A minimum of two marine mammal observers shall be placed on all support vessels during the spring and fall gray whale migration periods, and during periods/seasons when marine mammals are known to be in the project area and along the barge route in relatively large numbers. Observers can include the vessel operator and/or crew members, as well as any project worker that has received proper training. Vessel operators will make every effort to maintain a distance of 1,000 ft (305 m) from sighted whales and other threatened or endangered marine	On the vessel routes and the oil loading location.	Prepare and submit the plan to the CSLC and California Department of Fish and Game for review and approval.	There is no animal injury or mortality.	CSLC and California Department of Fish and Game.	Before the lease extension is granted.

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	mammals or marine turtles. Vessel speed shall be limited to 16 mph (14 knots). Support vessels will not cross directly in front of migrating whales or any other threatened or endangered marine mammals or marine turtles. When paralleling whales, supply vessels will operate at a constant speed that is not faster than the whales. Female whales will not be separated from their calves. Vessel operators will not herd or drive whales. If a whale engages in evasive or defensive action, support vessels will drop back until the animal moves out of the area. Any collisions with marine wildlife will be reported promptly to the Federal and State agencies listed below pursuant to each agency's reporting procedures. Stranding Coordinator, Southeast Region (currently, Joe Cordaro) National Marine Fisheries Service Long Beach, CA 90802-4213 (310) 980-4017 Enforcement Dispatch Desk California Department of Fish and Game Long Beach, CA 90802 (562) 590-5132 or (562) 590-5133 California State Lands Commission Environmental Planning and Management Division Sacramento, CA 95825-8202					

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	(916) 574-1890					
BIO-7: Oil Spill Impacts to Onshore Biological Resources (Class I)	**BIO-7a.** The OSCP shall be revised and updated to address protection of sensitive biological resources and revegetation of any areas disturbed during an oil spill or cleanup activities. The revised OSCP shall, at a minimum, include: 1. Specific measures to avoid impacts on Federal- and State-listed endangered and threatened species and ESHAs during response and cleanup operations. 2. Where feasible, low-impact, site-specific techniques such as hand-cutting contaminated vegetation and using low-pressure water flushing from vessels shall be specified in the OSHMP to remove spilled material from particularly sensitive wildlife habitats, such as coastal estuaries, i.e., Devereux Slough, because procedures such as shoveling, bulldozing, raking, and drag-lining can cause more damage to a sensitive habitat than the oil spill itself. The OSCP shall also evaluate the non-cleanup option for ecologically vulnerable habitats such as coastal estuaries. 3. Spill response personnel shall be adequately trained for response in terrestrial environments and spill containment and recovery equipment shall be maintained in full readiness. Inspection of equipment and periodic drills shall be conducted at least annually and the results evaluated so	On the vessel routes, the oil loading location, and the shoreline in the vicinity.	Update and submit the plan to the CSLC and California Department of Fish and Game for review and approval.	There is no animal injury or mortality; cleanup activities fully eliminate oil impacts to biological resources.	CSLC and California Department of Fish and Game.	Before the lease extension is granted.

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	that spill response personnel are familiar with the equipment and with the project area including sensitive onshore biological resources. 4. When habitat disturbance cannot be avoided, the OSCP shall provide stipulations for development and implementation of site-specific habitat restoration plans and other site-specific and species-specific measures appropriate for mitigating impacts on local populations of sensitive wildlife species and restoring native plant and animal communities to pre-spill conditions. Access and egress points, staging areas, and material stockpile areas that avoid sensitive habitat areas shall be identified. The OSCP shall include species- and site-specific procedures for collection, transportation and treatment of oiled wildlife, particularly for sensitive species. 5. Procedures for timely re-establishment of vegetation that replicates the habitats disturbed (or, in the case of disturbed habitats dominated by non-native species, replaces them with suitable native species) including: measures preventing invasion and/or spread of invasive or undesired plant species; restoration of wildlife habitat; restoration of native communities and native plant species propagated from local genetic sources including any sensitive plant species (such as the southern tarplant); and replacement of trees at the					

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	appropriate rate. 6. Monitoring procedures and minimum success criteria to be satisfied for restoration areas shall be determined. The success criteria shall consider the level of disturbance and condition of the adjacent habitats. Monitoring shall continue for 3 to 5 years, depending on habitat, or until success criteria are met. Appropriate remedial measures, such as replanting, erosion control or control of invasive plant species, shall be identified and implemented if it is determined that success criteria are not being met.					
Cultural Resources						
CR-1: Adverse impacts from oil spills (Class II)	**CR-1a.** The Oil Spill Contingency Plan (OSCP) shall be revised and updated to specifically address protection of cultural resources that could be disturbed during an oil spill or cleanup activities. The process to revise the OSCP shall, at a minimum, include: (1) A workshop shall be conducted by a qualified archaeologist and by a local Native American representative identified as a most likely descendant of the Barbareño Chumash by the Native American Heritage Commission to ensure that any new discoveries during oil spill cleanup activities are adequately recorded, evaluated, and, if impacted, mitigated. The workshop shall: a. review the types of archaeological resources that may be	Area of spill and vicinity.	Oil spill response and cleanup documentation.	Successful containment and cleanup of spill materials.	CSLC, EMT Supervisor, an oil spill response contractor, Santa Barbara County, City of Goleta.	Prior to lease renewal.

Impact (Class)	Mitigation Measure	Location	Monitoring / Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	uncovered; b. provide examples of common archaeological artifacts and other cultural material to examine; c. describe what makes an archaeological resource significant to archaeologists and local Native American descendants; d. procedures that would be used to record, evaluate, and mitigate new discoveries; e. describe reporting requirements and the responsibilities of spill response personnel. The revised OSCP shall, at a minimum, provide (1) that a qualified archaeologist and Native American representative shall be present during all ground disturbances within recorded CA-SBA-1327 and/or CA-SBA-2341 site boundaries. (2) procedures that would be followed in case of discovery of disturbed as well as intact human burials and burial-associated artifacts. In the event that human remains would be encountered, the consultation with the most likely Native American descendant pursuant to PRC sections 5097.97 and 5097.98 would apply.					

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